

**IN THE UNITED STATES BANKRUPTCY COURT  
Eastern District of Virginia  
Richmond Division**

**In re:**  
**Angela Denise Cross**  
Debtor

**Case No. 25-30922-BFK  
Chapter 13**

Address: 5216 Castlewood Road  
Apt A  
Richmond, VA 23234

Last four digits of SSN: xxx-xx-3830

**NOTICE OF MOTION TO SHORTEN THE NOTICE PERIOD ON MOTION TO  
EXTEND THE AUTOMATIC STAY**

The above named Debtor has filed a Motion to Shorten the Notice Period on the Motion to Extend the Automatic Stay filed in this bankruptcy case.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

**UNDER LOCAL BANKRUPTCY RULE 9013-1, UNLESS A WRITTEN RESPONSE IN OPPOSITION TO THIS MOTION AND SUPPORTING MEMORANDUM ARE FILED WITH THE CLERK OF COURT AND SERVED ON THE MOVING PARTY IMMEDIATELY UPON THE SERVICE OF THIS NOTICE, THE COURT MAY DEEM ANY OPPOSITION WAIVED AND TREAT THE MOTION AS CONCEDED.**

- The written response in opposition to this motion must be filed with the clerk of court at the address shown below. If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Clerk of Court  
United States Bankruptcy Court  
701 E. Broad Street, Suite 4000  
Richmond, VA 23219-3515

- You must also send a copy to:

Boleman Law Firm, P.C.  
P. O. Box 11588  
Richmond, VA 23230-1588

Dated: March 24, 2025

BOLEMAN LAW FIRM, P.C.  
Counsel for Debtor

ANGELA DENISE CROSS

By: /s/ Daniel J. Webster  
Daniel J. Webster (VSB#92593)  
Boleman Law Firm, P.C.  
P.O. Box 11588  
Richmond, VA 23230-1588  
Telephone (804) 358-9900  
Counsel for Debtor

### **CERTIFICATE OF SERVICE**

I certify that on March 24, 2025 I have transmitted a true copy of the foregoing document electronically through the Court's CM/ECF system or by mail to the Debtor, Chapter 13 trustee, the United States trustee if other than by the electronic means provided for at Local Bankruptcy Rule 2002-1, and to all creditors and parties in interest on the mailing matrix attached hereto.

/s/ Daniel J. Webster  
Counsel for Debtor

**IN THE UNITED STATES BANKRUPTCY COURT  
Eastern District of Virginia  
Richmond Division**

**In re: Angela Denise Cross  
Debtor**

**Case No. 25-30922-BFK  
Chapter 13**

**MOTION TO SHORTEN THE NOTICE PERIOD ON MOTION TO EXTEND THE  
AUTOMATIC STAY**

COMES NOW Angela Denise Cross (the “Debtor”), by counsel and respectfully requests that the Court schedule an expedited hearing and shorten the notice period on the Debtor’s Motion to Extend the Automatic Stay (the “Motion”). In support thereof, Debtor respectfully states the following:

1. This case commenced upon the filing of a voluntary petition under Chapter 13 of Title 11 of the United States Bankruptcy Code in this Court on March 11, 2025.
2. Debtor seeks permission to shorten the notice period for the Motion to Extend the Automatic Stay from twenty-one (21) days to sixteen (16) days from the date of service of the Motion to Extend the Automatic Stay.
3. That a shortened notice period on the Motion are necessary for the following reason: there are not available court dates within the regular notice period prior to the expiration of the stay.
5. A shortened notice period are necessary under the circumstances and creditors and parties in interest will not be prejudiced by such expedited hearing being granted.

WHEREFORE Angela Denise Cross, by counsel, respectfully requests this Honorable Court to enter an Order shortening the notice period for the Motion to Extend

the Automatic Stay from twenty-one (21) days to sixteen (16) days from the date of service of the Motion to Extend the Automatic Stay, and for such other and further relief as the Court deems proper.

ANGELA DENISE CROSS

By Counsel

/s/ Daniel J. Webster

Daniel J. Webster (VSB#92593)

Boleman Law Firm, P.C.

P.O. Box 11588

Richmond, VA 23230-1588

Telephone (804) 358-9900

Counsel for Debtor

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/s/ Daniel J. Webster

Counsel for Debtor

ADT Security  
Re: Bankruptcy  
PO Box 371967  
Pittsburgh, PA 15250

Alcoa Billing Center  
3429 Regal Dr.  
Alcoa, TN 37701

Amcol Systems, Inc.  
RE:  
111 Lancewood Road  
Columbia, SC 29210

America First Finance  
3515 N. Ridge Road  
Suite 2000  
Wichita, KS 67205

American Freight, Inc.  
7288 Hanover Green Drive  
Mechanicsville, VA 23111

ARS Account Resolutions  
1643 NW 136th Ave  
STE 100  
Fort Lauderdale, FL 33323

BB&T  
223 West Nash St  
Wilson, NC 27893

Bon Secours  
P.O. Box 1123  
Minneapolis, MN 55440

Bon Secours Medical Group  
7025 Harbour View Blvd, Ste118  
Suffolk, VA 23435-2762

Bon Secours Mercy Health  
PO Box 630761  
Cincinnati, OH 45263-1137

Bridgecrest Formerly Drivetime  
PO Box 29018  
Phoenix, AZ 85038

C&F Finance  
1313 E. Main St., Suite 400  
Richmond, VA 23219

Capio Partners  
3400 Texoma Parkway  
Sherman, TX 75090

Capital One Bank USA NA  
PO Box 30281  
Salt Lake City, UT 84130

City of Richmond - TAX  
900 E. Broad Street. Room 107  
Richmond, VA 23219

Commonwealth Radiology  
2810 N. Parham Road  
Suite 315  
Henrico, VA 23294-4434

Contract Callers Inc.  
501 Greene Street  
3rd Floor, Suite 302  
Augusta, GA 30901-4415

Credit Collection Services  
Re:  
725 Canton St  
Norwood, MA 02062

Crest Financial  
61 W. 13490 S  
Draper, UT 84020-7209

Debt Recovery Solutions, LLC  
Re:  
PO Box 1259  
Oaks, PA 19456-1259

Elizabeth River Tunnels  
152 Tunnel Facility Drive  
Portsmouth, VA 23707-1802

Emergency Coverage Corp  
PO Box 740023  
Cincinnati, OH 45274

Emergency Medical Associates  
Attn: Bankruptcy Dept.  
PO Box 5508  
Virginia Beach, VA 23471-5508

FBCS, Inc.  
Re: Bankruptcy  
P.O. Box 1116  
Charlotte, NC 28201-1116

Fed Loan Servicing  
P.O. Box 69184  
Harrisburg, PA 17106

Firstpoint Collection Resource  
P.O. Box 26140  
Greensboro, NC 27402-6140

GMAC Financial Services  
P.O. Box 380901  
Minneapolis, MN 55439-0901

HRRG  
Po Box 5406  
Cincinnati, OH 45273

Jefferson Capital Systems  
16 McLeland Road  
Saint Cloud, MN 56303

Johnsons Community Bonding  
RE: Bankruptcy  
1821 East Nine Mile Road  
Highland Springs, VA 23075

Labcorp  
Re: Bankruptcy Dept.  
PO Box 2240  
Burlington, NC 27216

Linebarger Googgan Blair &  
Sampson, LLP  
309 County St. Suite 201  
Portsmouth, VA 23704

Massanutten Resort  
PO Box 1227  
Harrisonburg, VA 22803-1227

Monument Pathologists, Inc.  
5801 Bremo Rd  
Richmond, VA 23226

North American Partners in Ane  
PO Box 8632  
Pompano Beach, FL 33075

Pendrick Capital Partners  
625 US-1  
Key West, FL 33040

Personal Finance Co.  
3612 W. Lincoln Hgwy  
P.O. Box 296  
Olympia Fields, IL 60461

Phoenix Financial Services  
8902 Otis Ave  
Ste 103  
Indianapolis, IN 46216

Progressive Insurance  
PO Box 31260  
Tampa, FL 33631

Pulmonary Associates of  
Richmond, Inc.  
1000 Boulders Pkwy, #102  
Richmond, VA 23225

Radiology Assoc. of Richmond  
PO Box 13343  
Richmond, VA 23225-0304

Receivables Performance Mgmt  
PO Box 1548  
Lynnwood, WA 98046-1548

Richmond Community Hospital  
Attn: Bankruptcy Department  
P.O. Box 28538  
Richmond, VA 23228

Sprint  
Attn: Bankruptcy Dept  
PO. Box 7949  
Overland Park, KS 66207-0949

St Mary's of Richmond  
9980 Georgia Street  
Crown Point, IN 46307

Sunrise Credit Services, Inc.  
Re: Sprint  
P.O. Box 9100  
Farmingdale, NY 11735

Syncb/Care Credit  
Po Box 965036  
Orlando, FL 32896

TRG Law PLLC  
8002 Discovery Drive  
STE 306  
Henrico, VA 23229

United Consumers  
Re: Bankruptcy  
P.O. Box 4466  
Woodbridge, VA 22194

US Acute Care  
PO Box 98220  
Pompano Beach, FL 33075

Verizon Wireless  
500 Technology Drive  
Ste. 300  
Saint Charles, MO 63304-2225

Wakefield & Associates  
P.O. Box 441590  
Aurora, CO 80044-1590